AICC Alarm Industry Communications Committee

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VIA ELECTRONIC DELIVERY

January 12, 2010

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Room TWA325 Washington, DC 20554

Re: Written Ex Parte Communication

PS Docket No. 06-229, WT Docket No. 06-150

Dear Ms. Dortch:

The Alarm Industry Communications Committee ("AICC"), on behalf of its members, writes to express its support for the efforts of the Federal Communications Commission ("Commission"), the Public Safety Spectrum Trust ("PSST"), and other members of the public safety community to facilitate the construction and operation of a nationwide, interoperable public safety-grade wireless broadband network in the 700 MHz band.¹

The AICC's member companies protect a wide range of sensitive facilities and their occupants from fire, burglaries, sabotage, and other emergencies. For example, they protect government offices, power plants, hospitals, dam and water authorities, pharmaceutical plants, chemical plants, banks, and schools and universities. In addition, alarm companies protect an increasing number of residents from intruders,

¹ The AICC is comprised of representatives of the Central Station Alarm Association ("CSAA"), the Electronic Security Association ("ESA") (formerly the National Burglar & Fire Alarm Association), the Security Industry Association ("SIA"), Bosch Security Systems, Digital Monitoring Products, Digital Security Control, Telular, Stanley Tool (alarm division, formerly known as Honeywell Monitoring), Honeywell Security, Vector Security, Inc., ADT Security Services, Inc., AES-IntelliNet, GE Security, Alarm.com, Emizon LLC, Intertek Testing, Security Network of America, Numerex and Underwriters' Laboratories. CSAA, ESA, and SIA are comprised of central station alarm companies, alarm monitoring centers, alarm installation companies and alarm manufacturing companies. Their memberships represent the majority of such companies operating in the United States.

burglary, and fire. They also provide medical alert services (e.g., obtaining ambulances) during medical emergencies.

The AICC's member companies regularly communicate with first responders through these and other activities, and they recognize the importance and vital role of secure, reliable, prioritized communications in optimizing emergency response times. Urgent alarm information must be transmitted to alarm handling centers, and then to public safety answering points ("PSAPs") and appropriate first responders, as quickly and reliably as possible. Thus, in addition to public safety's urgent need for secure, reliable, prioritized communications, there also is commercial demand for such services.

The proposed nationwide, interoperable wireless broadband network will facilitate more options for secure, reliable, prioritized communications to public safety. It also will encourage service providers to deploy new commercial services with greater reliability, security, and priority access features. Therefore, the AICC urges the Commission to continue its efforts to make the network a reality. Although establishing and building out the nationwide network will be a significant challenge, policymakers must continue their efforts to meet our national security and public safety communications needs and advance the deployment of such mission-critical broadband services. As the PSST has stated, "[a]ny review of major crises such as 9-11 or Hurricane Katrina shows how much the personal efforts and effectiveness of our nation's first responders – police, firefighters, emergency medical personnel, and others – are diminished or undermined when the communications infrastructure that supports their life-saving efforts does not meet their mission-critical needs."²

Finally, the AICC joins the PSST in encouraging the Commission to authorize and incentivize public/private partnerships in the 700 MHz band. Absent other funding sources, these partnerships can provide critical financial support, network infrastructure, and other resources to public safety, reducing costs and further advancing critical broadband deployment. In addition, they could spark the deployment of additional commercial services with greater reliability, security, and priority access features.

Respectfully submitted,

<u>/s/ Louis T. Fiore</u>
Louis T. Fiore
Chairman
Alarm Industry Communications Committee

² Comments of the Public Safety Spectrum Trust Corporation, PS Docket No. 06-229, 1-2 (filed Oct. 16, 2009), *citing* Written Testimony of Chief Harlin R. McEwen, Chairman, Public Safety Spectrum Trust Corporation and Chairman, Communications & Technology Committee, International Association of Chiefs of Police, before the United States House of Representatives, Committee on Energy and Commerce, Subcommittee on Communications, Technology and the Internet, 3 (Sept. 24, 2009).